

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-10085-RGS
	)	
MIHN NGOC PHAN	)	
	)	

Motion to Modify Conditions of Release

Defendant, Mihn Phan, through his counsel respectfully requests that this Court allow him to travel with family to Brattleboro, Vermont on June 14, 2004, for his father's sentencing hearing in Federal Court. In addition, Mr. Phan requests that his curfew be extended to 11:00 p.m. on that day.

The defendant's Pre-Trial Services Officer, Basil Cronin, and the Assistant United States Attorney assigned to this case, Heidi Breiger, have no objection to this request.

MIHN NGOC PHAN  
By his attorney,

/s/Page Kelley  
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